

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;
JAMISON J., by and through his next friend, Clara Lewis;
DESIREE, RENEE, TYSON, and MONIQUE P.,
by and through their next friend, Sylvia Forster;
JOHN A., by and through his next friend, James D. Johnson;
CODY B., by and through his next friend, Sharon Scott;
MARY, TOM, MATTHEW, and DANA W.,
by and through their next friend, Zelatra W.; AND
SAM H., by and through his next friend, Yvette Bullock;
on their own behalf and behalf of all others similarly situated

PLAINTIFFS,

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director of the Department
of Human Services; AND BILLY MANGOLD,
as Director of the Division of Family and Children's Services

DEFENDANTS.

**PLAINTIFFS' MOTION FOR AWARD OF CLASS COUNSEL'S FEES AND
EXPENSES**

Plaintiffs respectfully move this Court for an order granting them attorneys fees and expenses in the amount of \$345,698.11 for the monitoring and enforcement of the Modified Mississippi Settlement Agreement and Reform Plan ("MSA", Dkt. No. 571), from December 1, 2014 through November 30, 2015. This motion is brought pursuant to 42 U.S.C. § 1988 and Federal Rule of Civil Procedure 54. This motion is supported by the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Award of Class Counsel's Fees and Expenses, which is filed contemporaneously with and incorporated by reference into this motion. Plaintiffs also submit the following exhibits in support of this motion:

Exhibit 1: Declaration of Marcia Robinson Lowry (with Attachments A, B, C, and D)

Exhibit 2: Declaration of Sara Robinson-Glasser (with Attachment A)

Exhibit 3: Declaration of Stephen Dixon (with Attachment A)

Exhibit 4: Declaration of W. Wayne Drinkwater (with Attachments A, B, and C)

Exhibit 5: Declaration of Luke Dove.

As explained in full in Plaintiffs' accompanying memorandum of law and the supporting Declarations, the fees and expenses that Plaintiffs seek this monitoring period were reasonable and necessary to the representation of the Class. The requirements for a finding that the fees and expenses were reasonable and necessary are amply detailed in the accompanying supporting documents.

Respectfully submitted, this 1st day of April, 2016.

/s Marcia Robinson Lowry

Marcia Robinson Lowry (MBN 43991 (*pro hac vice*)

Sara Robinson-Glasser (MBN 47547 (*pro hac vice*)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2016 I electronically filed the foregoing with the Clerk of the Court using the electronic filing system which will send notification of such filing to the following:

Dewitt L. ("Rusty") Fortenberry, Jr. (MSB #5435)
Kenya Key Rachal (MSB #99227)
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s/Marcia Robinson Lowry

MARCIA ROBINSON LOWRY